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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 13-0145 YGR
)	
Plaintiff,)	STIPULATION REQUESTING
)	AMENDED PROTECTIVE ORDER, AND
v.)	ORDER
)	
MATTHEW AARON LLANEZA,)	
)	
Defendant.)	
)	

The parties respectfully stipulate as follows:

1. The United States wishes to turn over discovery materials in this matter to counsel for defendant Matthew Aaron Llaneza. These materials include information that could compromise government sources and investigative methods if it were released publicly. Accordingly, the United States respectfully asks the Court to enter the protective order set forth below.

2. Defendant's counsel stipulates to entry of the proposed protective order set forth below.

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STIP. REQUESTING AMENDED PROTECTIVE ORDER, AND ORDER
CR 13-0145 YGR

1 3. Accordingly, the parties respectfully ask the Court to enter the proposed
2 protective order set forth below.

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4 DATED: March 8, 2013

_____/s/_____
JEROME MATTHEWS
Attorney for Defendant

5
6
7 DATED: March 8, 2013

_____/s/_____
ANDREW P. CAPUTO
Assistant United States Attorney

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9
10 **AMENDED PROTECTIVE ORDER**

11 The United States has moved for a protective order limiting the use of discovery
12 materials in this case. Good cause having been shown, **IT IS HEREBY ORDERED THAT:**

13 1. The contents of the discovery materials produced by the United States to the
14 defendant in this case (discovery materials) shall not be disclosed in any form to any other
15 person by defense counsel except to members of defendant's trial team (co-counsel, paralegals,
16 investigators, translators, litigation support personnel, the defendant, secretarial staff, and experts
17 retained to assist in the preparation of the defense), and then only for the specific purposes
18 relating to defending the client in this case.

19 2. Unless expressly authorized by this Court, no information derived from the
20 discovery materials which are the subject of this order may be disclosed to any individual or
21 entity for any other use.

22 3. Neither the United States nor defendant's trial team shall disclose the actual or
23 cover names of any undercover government employee or government source involved in this
24 case at any time, including in any public court filing or hearing in open court.

25 4. The defendant's trial team shall store and maintain custody of the discovery
26 materials, and any materials derivative of the discovery materials, in a secure place and use
27 reasonable care to ensure that these materials are not disclosed to third persons in violation of
28 this Protective Order.

1 5. Each of the individuals to whom disclosure of discovery materials is made shall
2 be provided a copy of this Protective Order, and will be advised that he or she shall not further
3 disseminate the discovery materials except by the express direction of counsel of record or co-
4 counsel in this matter.

5 6. Each individual to whom such disclosure is made shall review this Protective
6 Order and defense counsel shall keep a record of those to whom disclosure is made.


7 7. Defense counsel shall notify the United States if anyone on the defendant's trial
8 team makes copies of any of the audio or video recordings produced to the defense by the United
9 States in this case, as well as the number of copies made of any particular recording. At the
10 conclusion of this criminal matter, defense counsel shall return to the United States all discovery
11 materials and any copies thereof. Defense counsel shall destroy any material that is derivative of
12 the discovery material other than attorney work product.

13 8. Nothing in paragraph seven (7) shall be construed to prohibit the defendant's trial
14 team from uploading the discovery materials to an office computer network provided that: 1)
15 those persons on the defendant's trial team having access to the files containing the discovery
16 materials have read this Protective Order; and, 2) all copies of the discovery materials are deleted
17 from the computer network at the conclusion of this matter.

18 9. A willful violation of this Protective Order shall constitute criminal contempt of
19 Court for which sanctions are provided by law. The parties who agree to receive information
20 subject to this Order agree that this Court has jurisdiction to enter this Order.

21 10. The Protective Order entered in this case on February 21, 2013 is hereby vacated.
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24 Dated: March 12, 2013


YVONNE GONZALEZ ROGERS
United States District Judge